obtain responses to his requests for releases from the relevant third parties has been

1	frustrated as those third parties have filed notices of unavailability for vacation purposes
2	in the underlying state court litigation, as well as the judge in the state court litigation has
3	changed. Plaintiff's counsel believes that an additional extension will allow him the
4	opportunity to obtain the necessary responses. Both parties agree that allowing for this
5	action will resolve and narrow issues in this case, so that if judicial intervention is
6	necessary, it will be required on a very limited basis.
7	If at any time in the next 45 days it becomes apparent that resolution between the
8	parties is not feasible, the parties will submit a briefing schedule to the Court.
9	The parties propose a joint status report to be filed on or before September 26,
10	2019.
11	DATED this 12th day of August, 2019.
12	
13	Respectfully Submitted,
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16	s/ Michelle R. Lambert
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